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VIA ECF FILING

August 8, 2017

Honorable Peggy Kuo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Meng Meng Lin v. City of New York, et al.* 16-CV-2270

Dear Magistrate Judge Kuo:

I am an attorney representing the Plaintiff, Meng Meng Lin, in the above-referenced matter. I respectfully submit this Reply letter in compliance with this Court's order and in further support of Plaintiff's motion to compel defendants to comply with Fed. R. Civ. P. 26(b)(1), due to Defendants' failure to respond to Plaintiff's demands for production of documents discovered during the Defendants' depositions.

At the depositions in June 2017, my office asked defendants' counsel multiple times for the "medical treatment form" and the "line-of-duty paperwork". *See* Ex. A, B, of motion. On June 8, 2017, my office wrote to Mr. Brustein requesting the same documents. *See* Ex. C of motion.

Only after plaintiff filed the instant motion to compel, has Mr. Brustein produced a one-page document that he purported to be the "line-of-duty paperwork". My office emailed Mr. Brustein asking about the other document we requested in our motion to compel: the medical treatment form. *See* Email, attached herein as **Ex. A**. Mr. Brustein responded ignoring my question. *See Id.* That is the pattern of communications with Mr. Brustein: He ignores our questions; making phone calls futile.

Both the documents requested in Plaintiff's motion are still outstanding: 1) medical treatment form and 2) the line-of-duty paperwork. "Paperwork" refers to multiple pages, which the one-page document that Mr. Brustein emailed our office surely cannot be the paperwork mentioned by the witnesses during their depositions. *See* Ex. A of motion.

Sincerely,
/s/ Jean Wang
Wang Law Office, PLLC

Enclosures



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Cc.: VIA ECF FILING

Evan Brustein

Attorney for City Defendants